

## UNITED STATES DISTRICT COURT

for the  
Southern District of TexasUnited States Courts  
Southern District of Texas  
FILED**May 5, 2025**

Nathan Ochsner, Clerk of Court

United States of America  
v.

Manuel Flores III (1990)

Rene Cuellar Jr. (1982)

Case No. **M-25-0998-M***Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 5, 2025 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:*Code Section*

21 USC § 846

21 USC § 841

*Offense Description*Posses with Intent to Distribute 1.08 kilograms of cocaine, a schedule II  
controlled substance and conspiracy to do so.

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.

Complaint authorized by: AUSA Jose Garcia

Submitted by reliable electronic means, sworn to  
and attested to telephonically per Fed. R. Cr. 4.1,  
and probable cause found on:Date: May 5, 2025 at 10:20 p.m.City and state: McAllen, Texas/s/ Ileen Torres*Complainant's signature*Ileen Torres DEA Special Agent*Printed name and title**Judge's signature*Hon. Nadia S. Medrano U.S. Magistrate Judge*Printed name and title*

On May 5, 2025, DEA and Hidalgo County HIDTA agents established surveillance on Manuel FLORES III (FLORES) who resides in Weslaco, Texas (Target Location). On the same date agents observed a black Chevrolet pick-up truck arrive to the Target Location. Agents observed FLORES exit the residence and hand the driver of the Chevrolet pick-up truck a white item. The black Chevrolet pick-up truck subsequently departed the residence.

Hidalgo County HIDTA Constables conducted a traffic stop on the black Chevrolet pick-up truck. Rene CUELLAR JR was determined to be the driver of the vehicle. A K-9 free air sniff was conducted on said vehicle to which alerted to the smell of narcotics. A subsequent search of the Chevrolet pick-up truck was conducted, and one kilogram of cocaine was discovered under the driver seat. The kilogram of cocaine was inside a white plastic bag consistent with what CUELLAR was handed over at the Target Location by FLORES.

Agents obtained a signed Search Warrant for the Target Location. Agents executed a search of the Target Location and discovered bulk cash. After detaining FLORES, Agents read FLORES his Miranda Rights to which he waived and agreed to speak to agents. During the interview, FLORES admitted to providing a kilogram of cocaine to CUELLAR for approximately \$10,400.00.

Agents conducted a field test of the one package which resulted in a positive test for cocaine.